

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PIERRE BRAZEAU, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN, and
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00751

CLASS ACTION

WANDA NEWELL, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760

CLASS ACTION

KATLYN K. REIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN, and
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00856

CLASS ACTION

**[PROPOSED] ORDER CONSOLIDATING RELATED CASES,
APPOINTING THIBAUT MAGNIN AS LEAD PLAINTIFF,
AND APPROVING HIS CHOICE OF COUNSEL**

Having considered the motion of Thibault Magnin (“Magnin”) to (1) consolidate the above-captioned actions into one action for all purposes; (2) appoint Magnin to serve as Lead Plaintiff in the consolidated securities class action; and (3) approve Magnin’s selection of Berman Tabacco as Lead Counsel for the class and George Brothers Kincaid & Horton, L.L.P. as Liaison Counsel for the class, and good cause appearing:

IT IS HEREBY ORDERED THAT:

The three above-captioned related actions, *Brazeau v. Cassava Sciences, Inc., et al.*, No. 1:21-cv-00751; *Newell v. Cassava Sciences, Inc., et al.*, No. 1:21-cv-00760; and *Rein v. Cassava Sciences, Inc., et al.*, No. 1:21-cv-00856, pending in this District, are consolidated for all purposes as each of the actions assert the same claims and are based on the same legal and factual allegations. All relevant filings and submissions shall be maintained as one file under the earliest-filed docket number, No. 1:21-cv-00751, which will serve as the lead case. The clerk is directed to administratively close the later-filed actions, Nos. 1:21-cv-00760 and 1:21-cv-00856. All future filings should be made in the lead case only, with the caption *In re Cassava Sciences, Inc. Securities Litigation*.

The Court concludes that Magnin is the “most adequate plaintiff” and complies with the requirements of Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”). Pursuant to Section 21D(a)(3)(B) of the Exchange Act, Magnin is appointed as Lead Plaintiff in this consolidated action and in any related actions consolidated pursuant to this Order.

Magnin’s selection of the law firm of Berman Tabacco to serve as Lead Counsel and George Brothers Kincaid & Horton, L.L.P. as Liaison Counsel for the class is approved pursuant

to 15 U.S.C. §78u-4(a)(3)(B)(v). Lead Counsel shall have, *inter alia*, the following responsibilities and duties to perform or delegate as appropriate:

- a) File a consolidated complaint and any amended consolidated complaints;
- b) Brief and argue motions;
- c) Initiate and conduct discovery, including, without limitation, coordination of discovery with Defendants' counsel and the preparation of written interrogatories, requests for admissions, and requests for production of documents;
- d) Direct and coordinate the examination of witnesses in depositions;
- e) Act as a spokesperson at pretrial conferences;
- f) Initiate and conduct any settlement negotiations with Defendants' counsel;
- g) Consult with and employ experts; and
- h) Supervise all other matters related to the prosecution or resolution of this consolidated action.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ROBERT PITMAN
UNITED STATES DISTRICT JUDGE